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Petitioners and former Plaintiffs
MATGARITO LAGUNAS-SALAZAR and
CLEMENTINA MONROY-MIRANDA

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MATGARITO LAGUNAS-SALAZAR, an individual; **CLEMENTINA MONROY-MIRANDA**, an individual; and each of them as Guardians *ad litem* of **MICHELLE MONROY**, an individual minor,

Plaintiffs,

vs.

DALE SUMMERLIN, an individual;

Defendant.

Case No. 2:12-cv-867-RFB-(VCF)

**PETITIONERS and FORMER PLAINTIFFS
MATGARITO LAGUNAS-SALAZAR and
CLEMENTINA MONROY-MIRANDA'S
MOTION TO FILE UNDER SEAL, and
(PROPOSED) ORDER**
(Fed. R. Civ. P., 5.2 and Local Rule IA 10-5)

Petitioners and former Plaintiffs **MATGARITO LAGUNAS-SALAZAR** and **CLEMENTINA MONROY-MIRANDA**¹ ("Petitioners"), the natural parents and Guardians *ad litem* of **MICHELLE LAGUNAS-MONROY**, an individual minor child, by their counsel, Joseph N. Mott, of LAW OFFICES OF STEVEN J. PARSONS, and as provided for within Fed. R. Civ. P., 5.2 and Local Rule IA 10-5,

¹On August 2, 2016, their individual cases having been settled, Plaintiffs **MATGARITO LAGUNAS-SALAZAR**, and **CLEMENTINA MONROY-MIRANDA** moved the Court to dismiss their claims as individuals, *with prejudice*. By way of the Stipulation the parties filed on August 2, 2016, only claims for Michelle, the minor child remain.

Here, as Guardians *ad litem*, they Petition the Court on behalf of their minor child **MICHELLE LAGUNAS-MONROY**, as set forth herein. Upon the Court's consideration of the instant Petition, the entire case will be dismissed, *with prejudice*.

1 hereby requests permission to file, under seal, medical records and billings for **MICHELLE**
2 **LAGUNAS-MONROY**, the minor.

3 Petitioners have contemporaneously also filed a Petition seeking the Court's approval
4 of the Compromise of Disputed Claims of a Minor on behalf of the minor child.

5 This Motion seeks the Court's permission to file, under seal, the subject medical
6 records and billings in support of the Petition, and is brought and based upon the pleadings
7 and papers on file, and the attached Memorandum of Points and Authorities.

8 Dated: Wednesday, October 26, 2016.

9 LAW OFFICES OF STEVEN J. PARSONS

10 /s/ Joseph N. Mott
11 JOSEPH N. MOTT
Nevada Bar No. 12455

12 Attorneys for Petitioners and former Plaintiffs
13 **MATGARITO LAGUNAS-SALAZAR** and
CLEMENTINA MONROY-MIRANDA

14 **CERTIFICATE OF SERVICE**

15 Within FRCP 5, LR IA 10-5, and LR IC 4-1, I hereby certify that service of the foregoing
16 Petitioners Matgarito Lagunas-Salazar and Clementina Monroy-Miranda's Motion to File Under
17 Seal and all documents was made upon all parties by e-filing with the Court's electronic filing
18 system and by hand delivery in accordance with LR IC 4-1(C).

19 Dated: October 26, 2016.

20 /s/ Candice Benson
21 An Employee of LAW OFFICES OF STEVEN J. PARSONS

22 **MEMORANDUM OF POINTS AND AUTHORITIES**

23 FRCP 5.2(d) provides, "The court may order that a filing be made under seal without
24 redaction. The court may later unseal the filing or order the person who made the filing to file
25 a redacted version for the public record."

26 LR IA 10-5(a) provides, "Unless otherwise permitted by statute, rule or prior court order,
27 papers filed with the court under seal shall be accompanied by a motion for leave to file those

documents under seal.... All papers filed under seal will remain sealed until the court either denies the motion to seal or enters an order unsealing them.”

Pursuant to these sections, Petitioners move the Court for permission to file under seal the minor child’s medical records and billings, which are referenced as Exhibit 1 of Petitioners and former Plaintiffs Matgarito Lagunas-Salazar and Clementina Monroy-Miranda’s Petition for Compromise of Disputed Claims of a Minor, filed on or about October 26, 2016, (Doc. No. 82).

Dated: Wednesday, October 26, 2016.

LAW OFFICES OF STEVEN J. PARSONS

/s/ Joseph N. Mott

JOSEPH N. MOTT

Nevada Bar No. 12455

Attorneys for Petitioners and former Plaintiffs

MATGARITO LAGUNAS-SALAZAR and

CLEMENTINA MONROY-MIRANDA

ORDER

IT IS HEREBY ORDERED, that upon Petitioners Matgarito Lagunas-Salazar and Clementina Monroy-Miranda’s Petitions for Compromise of Disputed Claims of a Minor Michelle Lagunas-Monroy, the minor child, and upon the forgoing Motion, and within Fed. R. Civ. P., 5.2 and Local Rule IA 10-5, and good cause shown, the required medical records and expense billing, specifically Exhibit 1 of the Petition, only, shall be filed **UNDER SEAL**.

Dated: ¹¹⁻¹_____, 2016.



U.S. MAGISTRATE JUDGE